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ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BARBARA A. WILHELM,
Plaintiff

v.

COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

NO. 1:CV-01-1057

(JUDGE RAMBO)

FILED
HARRISBURG, PA

MAY 06 2002

MARY E. D'ANDREA CLERK
Per RB Deputy Clerk

**PLAINTIFF'S CONCURRED-IN MOTION FOR AN
ENLARGEMENT OF TIME TO FILE A MEMORANDUM IN OPPOSITION TO
DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Fed.R.Civ.P. 6(b), Plaintiff, Barbara A. Wilhelm, by and through her attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of 1 day, to and including May 7, 2002, to file Plaintiff's Memorandum In Opposition To Defendant's Motion For Partial Summary Judgement, and in support thereof, sets forth the following:

1. This action alleges sex discrimination and retaliation in connection with plaintiff's employment with the Pennsylvania State Police.
2. The complaint raises numerous factual and legal issues including discrimination in compensation under the Equal Pay Act, 29 U.S.C. §206(d) and the Pennsylvania Human Relations Act, 43 Pa. C. S. §955;

discrimination in the conditions of employment under Title VII and the Pennsylvania Human Relations Act; discrimination and retaliation in connection with two promotions under Title VII, the Pennsylvania Human Relations Act and the Pennsylvania Whistleblower Law and discrimination and retaliation under the same statutes in connections with plaintiff's dismissal.

3. On April 16, 2002, defendants mailed a motion for partial summary judgement, addressing all but one of these claims, to plaintiff's counsel.

4. Plaintiff's memorandum in opposition defendant's motion for partial summary judgment is due on May 6, 2002.

5. Plaintiff's memorandum is substantially complete.

6. This case involves approximately fifteen depositions and complex issues of law.

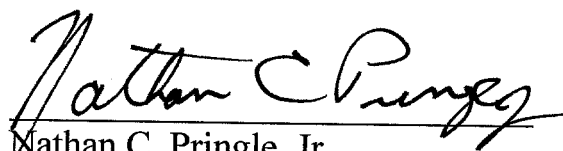
7. The requested enlargement of time is small and will not substantially delay the disposition of this matter nor will it prejudice the defendants.

8. Counsel for defendants, Susan J. Forney, has no objection to this request for an enlargement of time, as indicated on the attached certificate of concurrence.

WHEREFORE, the plaintiff, Barbara A. Wilhelm, respectfully

WHEREFORE, the plaintiff, Barbara A. Wilhelm, respectfully requests an enlargement of time of 1 day, to and including May 7, 2002, to file a memorandum in opposition to defendants' motion for partial summary judgment.

Respectfully Submitted,

A handwritten signature in black ink, reading "Nathan C. Pringle, Jr.", written over a horizontal line.

Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Avenue
Suite 200
Harrisburg, PA 17110
(717) 909-8520
Attorney for Plaintiff

May 6, 2002

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,
Plaintiff

v.

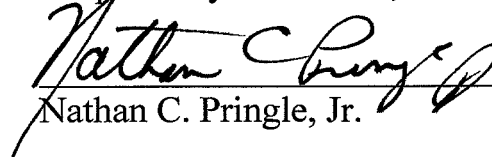
COMMONWEALTH OF PA.;
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: **NO. 1:CV-01-1057**
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: **(JUDGE RAMBO)**
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CERTIFICATE OF CONCURRENCE

Nathan C. Pringle, Esquire, counsel for the plaintiff, certified that on May 6, 2002, he spoke with Susan J. Forney, Esquire, counsel for defendants, regarding an enlargement of file a memorandum in opposition to defendants' motion for partial summary judgment. Ms. Forney concurred in the request.

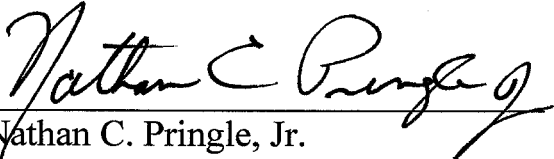
Respectfully Submitted,


Nathan C. Pringle, Jr.

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on May 6, 2002, I caused to be delivered by first class mail a copy of the foregoing document entitled plaintiff's concurred-in motion for an enlargement of time file a memorandum in opposition to defendants' motion for partial summary judgment upon the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120


Nathan C. Pringle, Jr.